

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:)	
)	Chapter 11
RS FIT NW LLC,)	
)	Case No.: 20-11558 (KBO)
Debtors.)	
)	(Jointly Administered)
<hr/>		
24 HOUR FITNESS WORLDWIDE, INC.,)	
)	
Plaintiff,)	
)	
v.)	
)	
CONTINENTAL CASUALTY COMPANY;)	
ENDURANCE AMERICAN SPECIALTY)	Adv. Proc. No. 20-51051 (KBO)
INSURANCE COMPANY; STARR SURPLUS)	
LINES INSURANCE COMPANY; ALLIANZ)	
GLOBAL RISKS US INSURANCE)	
COMPANY; LIBERTY MUTUAL)	
INSURANCE COMPANY; BEAZLEY-)	
LLOYD'S SYNDICATES 2623/623; ALLIED)	
WORLD NATIONAL ASSURANCE)	
COMPANY; QBE SPECIALTY INSURANCE)	
COMPANY; and GENERAL SECURITY)	
INDEMNITY COMPANY OF ARIZONA,)	
)	
Defendants.)	
)	
)	

PLAINTIFF'S *AMENDED* DEPOSITION NOTICE TO LOURDES REYES

Pursuant to the Court’s Amended Scheduling Order (Dkt. 181), Federal Rules of Civil Procedure 26 and 30, made applicable to the above-entitled adversary proceeding by Rules 9014 and 7030 of the Federal Rules of Bankruptcy Procedure, and Rule 7030-1 of the Local Rules of the United States Bankruptcy Court for the District of Delaware, Plaintiff 24 Hour Fitness Worldwide, Inc. (“Plaintiff”), by and through its attorneys of record, shall take the oral and videotape deposition of **Lourdes Reyes at 9:00 a.m. pacific time on September 29, 2022**, or at

such other date and time as the parties may agree, and continue from day to day until the deposition is completed.

The deposition will proceed via web-based video conferencing software, and will be recorded by stenographic means. The deposition is to be taken for the purposes of discovery, examination, cross-examination, perpetuation of testimony, and any and all purposes allowed by law. Plaintiff will provide all parties with details regarding how to access the web-based video conferencing software no later than three calendar days before the deposition is set to begin.

Dated: August 26, 2022

REED SMITH LLP

By: /s/ Mark W. Eckard
Mark W. Eckard (No. 4542)
1201 North Market Street, Suite 1500
Wilmington, DE 19801
Telephone: (302) 778-7500
Facsimile: (302) 778-7575
Email: meckard@reedsmith.com

David E. Weiss (admitted *pro hac vice*)
T. Connor O'Carroll (admitted *pro hac vice*)
101 Second Street, Suite 1800
San Francisco, CA 94105
Telephone: (415) 543-8700
Facsimile: (415) 391-8269
Email: dweiss@reedsmith.com
cocarroll@reedsmith.com

**COUNSEL FOR PLAINTIFF 24 HOUR
FITNESS WORLDWIDE, INC.**